

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, )  
 ) No. CR 10-0565 JSW (EDL)  
Plaintiff, )  
 ) STIPULATION AND ORDER  
vs. ) MODIFYING CONDITIONS OF  
 ) RELEASE  
HUI JIN CHEN, aka Jenny, )  
 )  
Defendant. )  
\_\_\_\_\_ )

**STIPULATION**

Defense counsel avers that Hui Jin Chen, the defendant, has physical custody of her minor son and of the three minor children of her sister, a co-defendant in this case who is in custody. Ms. Chen has been released under conditions that include electronic monitoring with significant restrictions on her movement. In order to allow her to provide for the care of the children, including transporting them to school, the parties agree that the bond conditions should be modified as follows:  
“The defendant may leave home, with the prior approval of Pretrial Services, to provide for the care of the children in her custody, including school transportation.”

Defense counsel further avers that the U.S. Pretrial Services Office has been informed of and has no objection to the proposed modification of conditions.

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1 It is so stipulated.

2 DATED: 8/5/10

3 \_\_\_\_\_/s/  
RONALD C. TYLER  
4 Assistant Federal Public Defender  
Counsel for Hui Jin Chen

5  
6 DATED: 8/5/10

7 \_\_\_\_\_/s/  
DEBORAH R. DOUGLAS  
8 Assistant United States Attorney

9 **ORDER**

10 GOOD CAUSE APPEARING, the defendant's conditions of release are modified as follows:

11 The defendant may leave home, with the prior approval of Pretrial Services, to provide for the care  
12 of the children in her custody, including school transportation. In all other respects, this Court's  
13 previous order setting conditions of release remains in full force and effect.

14 IT IS SO ORDERED.

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18 DATED: August 5, 2010

